

**U.S. Bankruptcy Court
California Northern Bankruptcy Court (San Francisco)
Bankruptcy Petition #: 19-30088**

Assigned to: Judge Dennis Montali
Chapter 11
Voluntary
Asset

Date filed: 01/29/2019
Plan confirmed: 06/20/2020
341 meeting: 04/29/2019
Deadline for filing claims: 10/21/2019
Deadline for filing claims (govt.): 10/21/2019

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TERMINATED: 11/12/2019

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Filing Date	#	Docket Text
07/17/2020	<u>8443</u>	

			Statement of Issues on Appeal./ <i>Trade Committee's Statement of Issues, Designation of Items To Be Included In The Record, and Certification Regarding Transcripts</i> (RE: related document(s) <u>8261</u> Notice of Appeal and Statement of Election filed by Creditor Ad Hoc Committee of Holders of Trade Claims). Filed by Creditor Ad Hoc Committee of Holders of Trade Claims (Neumeister, Michael) (Entered: 07/17/2020)
07/31/2020		<u>8608</u>	Appellee Designation of Contents for Inclusion in Record of Appeal <i>Reorganized Debtors' Response to Trade Committee's Statement of Issues and Designation of Additional Items to be Included in the Record on Appeal</i> (RE: related document(s) <u>8261</u> Notice of Appeal and Statement of Election filed by Creditor Ad Hoc Committee of Holders of Trade Claims). Filed by Debtor PG&E Corporation (Rupp, Thomas) (Entered: 07/31/2020)

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12 *Holders of Trade Claims*

13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 In re:
17 PG&E CORPORATION
18 -and-
19 PACIFIC GAS AND ELECTRIC
COMPANY,
20 Debtors.
21 ☐ Affects PG&E Corporation
22 ☐ Affects Pacific Gas and Electric
Company
23 ☒ Affects both Debtors
24 * All papers shall be filed in the Lead
Case, No. 19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)
District Case No. 20-cv-04570-HSG

**TRADE COMMITTEE'S STATEMENT OF
ISSUES, DESIGNATION OF ITEMS TO
BE INCLUDED IN THE RECORD, AND
CERTIFICATION REGARDING
TRANSCRIPTS**

25 AD HOC COMMITTEE OF
26 HOLDERS OF TRADE CLAIMS,
27 Appellant,
v.
28 PG&E CORPORATION, et al.,
Appellees.

1 NOTICE IS HEREBY GIVEN that the Ad Hoc Committee of Holders of Trade Claims
2 (the “Trade Committee” or “Appellant”) hereby provides, pursuant to Rule 8009 of the Federal
3 Rules of Bankruptcy Procedure, the following statement of issues, designation of items to be
4 included in the record, and certificate regarding transcripts in connection with Appellant’s *Notice*
5 *of Appeal and Statement of Election to Have Appeal Heard by District Court* [D.I. 8261] (the
6 “Notice of Appeal”). As set forth in the Notice of Appeal, Appellant appeals from (i) the *Order*
7 *Confirming Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization*
8 *Dated June 19, 2020* [D.I. 8053] entered on June 20, 2020 (the “Confirmation Order”) and (ii) the
9 related *Memorandum Decision – Confirmation of Debtors’ and Shareholder Proponents’ Joint*
10 *Chapter 11 Plan of Reorganization* [D.I. 8001] entered on June 17, 2020 (the “Confirmation
11 Memorandum” and, together with the Confirmation Order, the “Confirmation Order and
12 Memorandum”) by the United States Bankruptcy Court for the Northern District of California (the
13 “Bankruptcy Court”). The Confirmation Memorandum incorporates by reference the Bankruptcy
14 Court’s prior decisions in (x) the *Interlocutory Order Regarding Postpetition Interest* [D.I. 5669]
15 entered on February 6, 2020 (the “PPI Order”) and (y) the related *Memorandum Decision*
16 *Regarding Postpetition Interest* [D.I. 5226] entered on December 30, 2019 (the “PPI
17 Memorandum” and, together with the PPI Order, the “PPI Order and Memorandum”). Appellant
18 specifically appeals from the Bankruptcy Court’s ruling in the PPI Order and Memorandum as
19 incorporated into the Confirmation Order and Memorandum.

20 STATEMENT OF ISSUES ON APPEAL

21 Bankruptcy Code section 1129 sets forth the requirements for confirmation of a chapter 11
22 plan. Section 1129(a)(8) requires that, “[w]ith respect to each class of claims or interests—
23 (A) such class has accepted the plan; or (B) such class is not impaired under the plan.” Under the
24 Bankruptcy Code, a class of claims is impaired unless the plan, with respect to each claim in such
25 class, “leaves unaltered [its] legal, equitable, and contractual rights.” 11 U.S.C. § 1124(1). A “class
26 that is not impaired,” on the other hand, is “conclusively presumed to have accepted the plan” and
27 has no right to vote on it. *Id.* § 1126(f).

28 Where an impaired class of claims votes to reject a chapter 11 plan, if all conditions of

1 section 1129(a) are satisfied other than section 1129(a)(8), the plan can be confirmed only if it
2 “does not discriminate unfairly, and is fair and equitable” with respect to each impaired class that
3 has not accepted the plan. *Id.* § 1129(b)(1). Moreover, for “each impaired class of claims,” section
4 1129(a)(7) requires that each holder of a claim or interest who has not accepted the plan must
5 “receive . . . under the plan . . . value . . . that is not less than the amount such holder would receive
6 . . . if the debtor were liquidated under chapter 7[.]” Section 726(a) of the Bankruptcy Code
7 provides the order by which estate property shall be distributed to creditors in a chapter 7
8 liquidation, and provides, as the “fifth” priority, for payment of post-petition interest “at the legal
9 rate.” In *Onink v. Cardelucci (In re Cardelucci)*, 285 F.3d 1231 (9th Cir. 2002), the Ninth Circuit
10 held that the “legal rate” under section 726(a)(5) was the federal judgment rate provided for in 28
11 U.S.C. § 1961. *See Cardelucci*, 285 F.3d at 1233.

12 Appellant’s members hold General Unsecured Claims¹ against the Debtors that are based
13 on contracts that incorporate California state law, which in turn provides that, in the event of
14 breach, interest shall accrue at the rate of 10 percent per annum, unless a different rate is specified
15 in writing. Cal. Civ. Code § 3289. The Debtors’ Plan provides for payment of post-petition interest
16 on General Unsecured Claims at the Federal Judgment Rate (calculated as of the Petition Date as
17 2.59%). The Plan nevertheless asserts that General Unsecured Claims are unimpaired, and thus
18 have no right to vote for or against the Plan or to challenge the Plan as “discriminating unfair[ly]”
19 or as not “fair and equitable” under Bankruptcy Code section 1129(b).

20 In the PPI Memorandum and Order, the Bankruptcy Court held that General Unsecured
21 Claims were impaired not by the Plan, but instead by section 726(a)(5) of the Bankruptcy Code
22 and its requirement that post-petition interest be paid at the “legal rate,” such that any class of
23 General Unsecured Claims is unimpaired. The issue on appeal is whether, in a bankruptcy case in
24 which the debtor is solvent, Bankruptcy Code section 726(a)(5), which can apply in a chapter 11
25 bankruptcy case only to “each impaired class of claims,” 11 U.S.C. § 1129(a)(7), may apply to
26 reduce the rate of interest owed to a class of claims that is asserted by the Plan to be unimpaired.

27
28 ¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Debtors’ and
Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* [D.I. 8048] (the “Plan”).

DESIGNATION OF RECORD ON APPEAL

Appellant hereby designates the following items to be included in the record on appeal, which includes all exhibits and addenda attached thereto and filed therewith and all documents incorporated by reference therein:

Item	Filing Date	Docket No. ²
Amended Declaration of Jason P. Wells in Support of First Day Motions and Related Relief	Feb. 1, 2019	263
Schedule E/F: Creditors Who Have Unsecured Claims For Non-Individual Debtor PG&E Corporation	Mar. 14, 2019	900
Schedule E/F: Creditors Who Have Unsecured Claims For Non-Individual Debtor Pacific Gas and Electric Company	Mar. 14, 2019	906
Debtors' Joint Chapter 11 Plan of Reorganization	Sept. 9, 2019	3841
Debtors' First Amended Joint Chapter 11 Plan of Reorganization	Sept. 23, 2019	3966
Verified Statement of Ad Hoc Committee of Holders of Trade Claims Pursuant to Bankruptcy Rule 2019	Oct. 16, 2019	4214
Order Establishing Pre-Confirmation Briefing and Hearing Schedule for Certain Legal Issues	Oct. 31, 2019	4540
Debtors' Joint Chapter 11 Plan of Reorganization Dated November 4, 2019	Nov. 4, 2019	4563
Debtors' Brief Regarding Applicable Rate of Postpetition Interest on Allowed Unsecured Claims and Joinder of PG&E Shareholders (the " <u>Debtors' Opening Brief</u> ")	Nov. 8, 2019	4624
Consolidated Edison Development Inc.'s Reservation of Rights Regarding Postpetition Interest on Unsecured Claims	Nov. 8, 2019	4625

² Unless otherwise indicated, all references herein to "Docket No." shall be to the docket maintained in the above-captioned chapter 11 cases.

1	Consolidated Opening Brief of the Official		
2	Committee of Unsecured Creditors and Other		
3	Creditor Groups and Representatives Regarding	Nov. 8, 2019	4634
4	the Appropriate Postpetition Interest Rate Payable		
5	on Unsecured Claim in a Solvent Debtor Case (the		
6	<u>“Creditor Groups’ Opening Brief”</u>)		
7	Joinder in Consolidated Opening Brief of the		
8	Official Committee of Unsecured Creditors and	Nov. 8, 2019	4636
9	Other Creditor Groups and Representatives		
10	Regarding the Appropriate Postpetition Interest		
11	Rate Payable on Unsecured Claims in a Solvent		
12	Debtor Case		
13	Reservation of Rights of the Ad Hoc Group of		
14	Subrogation Claim Holders Regarding the	Nov. 22, 2019	4840
15	Appropriate Postpetition Interest Rate Payable on		
16	Unsecured Claims in a Solvent Debtor Case		
17	Debtors’ Brief in Opposition to Consolidated		
18	Opening Brief of Unsecured Creditors and Other		
19	Creditor Groups and Representatives Regarding	Nov. 22, 2019	4849
20	the Appropriate Postpetition Interest Rate Payable		
21	on Unsecured Claims in a Solvent Debtor Case;		
22	Joinder of PG&E Shareholders (the <u>“Debtors’</u>		
23	<u>Responsive Brief”</u> and, together with the Debtors’		
24	Opening Brief, the <u>“Debtors’ Briefs”</u>)		
25	Consolidated Reply Brief of the Official		
26	Committee of Unsecured Creditors and Other		
27	Creditor Groups and Representatives Regarding	Nov. 22, 2019	4855
28	the Appropriate Postpetition Interest Rate Payable		
	on Unsecured Claims in a Solvent Debtor Case		
	(the <u>“Creditor Groups’ Responsive Brief”</u> and,		
	together with the Creditor Groups’ Opening Brief,		
	the <u>“Creditor Groups’ Briefs”</u>)		
	Letter Dated Dec. 5, 2019 in Support of Creditor		
	Groups’ Briefs	Dec. 5, 2019	5003
	Letter Dated Dec. 6, 2019 in Support of Debtors’		
	Briefs	Dec. 6, 2019	5018
	Memorandum Decision Regarding Postpetition		
	Interest	Dec. 30, 2019	5226

1	First Amended Verified Statement of Ad Hoc		
2	Committee of Holders of Trade Claims Pursuant to	Dec. 10, 2019	5060
3	Bankruptcy Rule 2019		
4	Debtors' and Shareholder Proponents' Joint		
5	Chapter 11 Plan of Reorganization Dated	Dec. 12, 2019	5101
6	December 12, 2019		
7	DOCKET TEXT ORDER (no separate order		
8	issued:) For the Make-Whole Optional		
9	Redemption issue arguments on January 14, 2020,		
10	at 10:00 AM, Debtors and the joining		
11	Shareholders will have a total of one hour,		
12	including time for rebuttal, to be shared as their		
13	counsel agree. The opposing creditor groups will		
14	also have one hour, to be shared as their counsel		
15	agree. At the conclusion of the hearing the court		
16	would like counsel to be prepared to address the	Jan. 9, 2020	N/A
17	questions raised in the Memorandum Decision		
18	regarding Postpetition Interest (Dkt. No. 5226),		
19	namely whether orders disposing of that issue and		
20	the Make-Whole issue should be certified for		
21	direct appeal to the court of appeal, certified as		
22	final under FRCP 54(b), or both, or neither. (RE:		
23	related document(s)[4896] Support		
24	Brief/Memorandum filed by Debtor PG&E		
25	Corporation). (Montali, Dennis)		
26	Trade Committee's Statement in Connection with		
27	January 29, 2020 Status Conference	Jan. 27, 2020	5517
28	Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b)		
	and 105(a) and Fed. R. Bankr. P. 6004 and 9019		
	for Entry of an Order (I) Approving and		
	Authorizing the Debtors to Enter into	Jan. 27, 2020	5519
	Restructuring Support Agreement with Consenting		
	Noteholders and Shareholder Proponents and		
	(II) Granted Related Relief		
	Debtors' and Shareholder Proponents' Joint		
	Chapter 11 Plan of Reorganization Dated January	Jan. 31, 2020	5590
	31, 2020		

Limited Objection of the Ad Hoc Committee of Holders of Trade Claims to Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Approving and Authorizing the Debtors to Enter into Restructuring Support Agreement with Consenting Noteholders and Shareholder Proponents and (II) Granted Related Relief	Feb. 3, 2020	5596
Interlocutory Order Regarding Postpetition Interest	Feb. 6, 2020	5669
Objection of the Ad Hoc Committee of Holders of Trade Claims to the Proposed Disclosure Statement for Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization	March 6, 2020	6152
Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated March 9, 2020	March 9, 2020	6217
Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated March 16, 2020	March 16, 2020	6320
Reservation of Rights and Limited Objection to Confirmation of Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization, Dated March 16, 2020	May 15, 2020	7221
Objection of the Ad Hoc Committee of Holders of Trade Claims to Confirmation of Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated March 16, 2020	May 15, 2020	7288
Teichert Pipelines' Objection to Proposed Cure Amount	May 15, 2020	7289
Limited Objection of the Official Committee of Unsecured Creditors to Plan Confirmation	May 15, 2020	7300
Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated May 22, 2020	May 22, 2020	7521

1	Plan Proponents' Joint Memorandum of Law and		
2	Omnibus Response in Support of Debtors' and	May 22, 2020	7528
3	Shareholder Proponents' Joint Chapter 11 Plan of		
4	Reorganization		
5	Notice of Filing of Debtors' and Shareholder	June 5, 2020	7793
6	Proponents' Updated Objection Summary Chart		
7	Memorandum Decision – Confirmation of	June 17, 2020	8001
8	Debtors' and Shareholder Proponents' Joint		
9	Chapter 11 Plan of Reorganization		
10	Debtors' and Shareholder Proponents' Joint	June 19, 2020	8048
11	Chapter 11 Plan of Reorganization Dated June 19,		
12	2020		
13	Order Confirming Debtors' and Shareholder	June 20, 2020	8053
14	Proponents' Joint Chapter 11 Plan of		
15	Reorganization Dated June 19, 2020		
16	<i>Onink v. Cardelucci (In re Cardelucci)</i> , Appellee's	N/A	N/A
17	Opening Brief, 2001 WL 34091272		
18	Hearing Transcripts	Filing Date	Docket No.
19	Transcript of Aug. 13, 2019 Hearing	Aug. 14, 2019	3540
20	Transcript of Sept. 24, 2019 Hearing	Sept. 25, 2019	4003
21	Transcript of Oct. 7, 2019 Hearing	Oct. 8, 2019	4162
22	Transcript of Oct. 23, 2019 Hearing	Oct. 24, 2019	4467
23	Transcript of Dec. 11, 2019 Hearing	Dec. 12, 2019	5085
24	Transcript of Hearing at Jan. 29, 2020 at 10:00	Jan. 30, 2020	5562
25	a.m. (PST)		
26	Transcript of Hearing at Jan. 29, 2020 at 1:30 p.m.	Jan. 30, 2020	5563
27	(PST)		
28	Transcript of Feb. 4, 2020 Hearing	Feb. 5, 2020	5634
	Transcript of May 27, 2020 Hearing	May 28, 2020	7637
	Transcript of May 28, 2020 Hearing	May 29, 2020	7665
	Transcript of May 29, 2020 Hearing	June 1, 2020	7701

1	Transcript of June 1, 2020 Hearing	June 2, 2020	7710
2	Transcript of June 3, 2020 Hearing	June 4, 2020	7784
3	Transcript of June 4, 2020 Hearing	June 5, 2020	7809
4	Transcript of June 5, 2020 Hearing	June 9, 2020	7843
5	Transcript of June 8, 2020 Hearing	June 10, 2020	7869
6	Transcript of June 11, 2020 Hearing	June 12, 2020	7932
7	Transcript of June 16, 2020 Hearing	June 17, 2020	7984
8	Transcript of June 19, 2020 Hearing	June 22, 2020	8066

10
11 Appellant reserves the right to designate additional items for inclusion in the record and/or
12 restate issues presented on appeal.

13 **CERTIFICATE REGARDING TRANSCRIPTS**

14 Appellant certifies pursuant to Bankruptcy Rule 8009(b)(1) that it is not ordering any
15 transcripts. All transcripts have been prepared, are filed on the docket, and have been designated
16 in the record.

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18 *[Signature to follow.]*

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Dated: July 17, 2020

GIBSON, DUNN & CRUTCHER LLP

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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Chapter 11 Case No. 19-30088 (DM)
(Lead Case)
(Jointly Administered)

**REORGANIZED DEBTORS' RESPONSE TO
TRADE COMMITTEE'S STATEMENT OF ISSUES
AND DESIGNATION OF ADDITIONAL ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL**

Relates to Docket Nos. 8261, 8443.

Pursuant to Rule 8009(a)(2) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), PG&E Corporation and Pacific Gas and Electric Company, as reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**,” as applicable) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), submit this response to the July 17, 2020 filing by the Ad Hoc Committee of Holders of Trade Claims (the “**Trade Committee**” or “**Appellant**”) of its *Statement of Issues, Designation of Items to be Included in the Record, and Certification Regarding Transcripts* [Dkt. No. 8443] (the “**Statement**”) in connection with its appeal.¹

Response to Statement of Issues on Appeal

The sole issue on appeal is whether the Bankruptcy Court properly applied binding Ninth Circuit precedent in holding that, in a solvent debtor case, a general unsecured creditor receives postpetition interest on its claim at the Federal Judgment Rate.

Designation of Record on Appeal

Pursuant to Rule 8009 of the Bankruptcy Rules, the Reorganized Debtors hereby designate the following additional items to be included in the record on appeal, which include all exhibits and addenda attached thereto and filed therewith and all documents incorporated by reference therein:

Item	Filing Date	Dkt. No.²
Second Amended Verified Statement Of The Ad Hoc Committee Of Senior Unsecured Noteholders Pursuant To Bankruptcy Rule 2019	October 21, 2019	4369
Order Pursuant To 11 U.S.C. §§ 363(b) And 105(a) And Fed. R. Bankr. P. 6004 and 9019 (I) Approving And Authorizing The Debtors To Enter Into Restructuring Support Agreement With Consenting Noteholders And Shareholder Proponents, And (II) Granting Related Relief	February 5, 2020	5637
Notice Of Withdrawal Of Chapter 11 Plan Of Reorganization Filed By The Ad Hoc Committee Of Senior Unsecured Noteholders	February 5, 2020	5644

¹ Capitalized terms not otherwise defined herein have the meanings ascribed to them in the *Order Confirming Debtor’s and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization dated June 19, 2020* [Dkt. No. 8053] (together with all related documents, attachments, and exhibits, the “**Confirmation Order**”).

² Unless otherwise indicated, all references herein to “Dkt. No.” shall be to the docket maintained in the above-captioned chapter 11 cases.

Item	Filing Date	Dkt. No. ²
Notice of Appeal from Interlocutory Order Regarding Postpetition Interest of Ad Hoc Committee of Holders of Trade Claims	February 20, 2020	5844
Motion of Ad Hoc Committee of Holders of Trade Claims for Leave to Appeal Order Regarding Postpetition Interest	February 20, 2020	5845
Memorandum in Support of Motion of Ad Hoc Committee of Holders of Trade Claims for Leave to Appeal Order Regarding Postpetition Interest	February 20, 2020	5846
Notice of Appeal to District Court and Statement of Election of the Official Committee of Unsecured Creditors	March 5, 2020	6097
Cross-Motion of the Official Committee of Unsecured Creditors for Leave to Appeal Order Regarding Postpetition Interest	March 5, 2020	6101
Notice of Appeal and Statement of Election by the Ad Hoc Committee of Senior Unsecured Noteholders Concerning Interlocutory Order Regarding Postpetition Interest	March 5, 2020	6103
Cross-Motion of Administrative Agent for Leave to Appeal Order Regarding Postpetition	March 5, 2020	6120
BOKF's Notice of Appeal and Election to Have Appeal Heard by District Court Concerning Order Regarding Postpetition Interest	March 5, 2020	6122
BOKF's Cross-Motion for Leave to Appeal Order Regarding Postpetition Interest Filed by Interested Party BOKF	March 5, 2020	6124
Disclosure Statement For Debtors' And Shareholder Proponents' Joint Chapter 11 Plan Of Reorganization	March 17, 2020	6353
Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	May 1, 2020	7037
Second Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	May 24, 2020	7563
Third Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 2, 2020	7712
Fourth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 5, 2020	7810
Fifth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 8, 2020	7841
Sixth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 10, 2020	7879
Seventh Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 11, 2020	7894
Eighth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 12, 2020	7929
Ninth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	June 21, 2020	8057
Tenth Plan Supplement in Connection With Joint Chapter 11 Plan of Reorganization	July 10, 2020	8364
Motion for Leave to Appeal Order Regarding Postpetition	February 21, 2020	ECF No. 3, 20-cv-

Item	Filing Date	Dkt. No. ²
Interest		01493-HSG
Response of Ad Hoc Committee of Senior Unsecured Noteholders, BOKF, NA, and the Ad Hoc Group of Subrogation Claim Holders in Opposition to Motion for Leave to Appeal Postpetition Interest	March 13, 2020	ECF No. 31, 20-cv-01493-HSG
Debtors' Opposition to Motion for Leave to Appeal Order Regarding Postpetition Interest; Joinder of PG&E Shareholders	March 13, 2020	ECF No. 32, 20-cv-01493-HSG
Reply in Support of Motion of Ad Hoc Committee of Holders of Trade Claims for Leave to Appeal Order Regarding Postpetition Interest	March 27, 2020	ECF No. 48, 20-cv-01493-HSG
Reply of Citibank N.A., as Administrative Agent in Support of Cross-Motion for Leave to Appeal Order Regarding Postpetition Interest	March 27, 2020	ECF No. 51, 20-cv-01493-HSG
Order Denying Motion for Leave to Appeal	April 14, 2020	ECF No. 62, 20-cv-01493-HSG

The Reorganized Debtors reserve all rights to designate additional items to include in the record or restate the issues presented on appeal.

Dated: July 31, 2020

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Theodore E. Tsekerides
Theodore Tsekerides

Attorneys for Debtors and Reorganized Debtors